

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON NON-REVISION PTO 298
(ELECTION WAVE) CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
DENISE ELSE, M.D. FOR NON-REVISION PTO 298 (ELECTION WAVE)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Denise Elser for Ethicon Wave 1, Dkt. 2053 (motion), Dkt. 2056 (memorandum in support); Dkt. 2228 (reply) and the reply brief filed in Ethicon Wave 3 (Dkt. 3052). Plaintiffs respectfully request that the Court exclude Denise Elser's testimony, for the reasons expressed in the Wave 1 and 3 briefing. This notice applies to the following Non-Revision PTO 298 (Election Wave) cases identified in Exhibit A attached hereto.

Dated: December 12, 2018

Respectfully submitted,

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EXHIBIT A

Cruz, Paulina	2:16-cv-09838
Harris, Judy A.	2:17-cv-00881
Lewis, Naomi	2:13-cv-17636
Munsch, Sheila	2:15-cv-04146

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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